

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA**

MICHAEL MILES , Individually,	:	
	:	
Plaintiff,	:	Case No. 3:14-cv-1752
	:	
v.	:	
	:	Judge Rudy Lozano
Shaffner & Shaffner Enterprises Inc. , an	:	
Indiana Corporation,	:	Magistrate Judge Christopher A
	:	Nuechterlein
Defendant.	:	
	:	
	:	
	:	
_____	:	
	:	

**AGREED MOTION FOR LEAVE TO FILE
CONFIDENTIAL SETTLEMENT AGREEMENT UNDER SEAL**

NOW COMES the Plaintiff, Michael Miles, through counsel, and hereby moves this Honorable Court for an Order granting leave file a Confidential Settlement Agreement under seal:

1. The parties having entered into a Confidential Settlement Agreement and Release dated April 2, 2015.
2. The terms of the parties Settlement Agreement and Release called for a confidentiality provision. Furthermore, adherence to this confidentiality provision was deemed a material part of the Agreement.
3. In the aforementioned agreement, the settlement calls for the Court to retain jurisdiction over this matter to enforce the terms in the Settlement Agreement.
4. Accordingly, the Plaintiff requests leave of this Court to file the Confidential Settlement Agreement and supporting exhibits under seal.
5. A proposed Order is attached hereto.

Respectfully submitted,

/s/ Owen B. Dunn Jr., Esq.

Counsel for Plaintiff:

Owen B. Dunn, Jr., Esquire

Ohio Bar No. 0074743

LAW OFFICE OF OWEN B. DUNN, JR.

4334 W. Central Ave., Suite 222

Toledo, OH 43615

(419) 241-9661

(419) 241-9737 – Fax

dunnlawoffice@sbcglobal.net

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was on this 16th day of April, 2015 served electronically to:

Counsel for Defendant

Randall L. Morgan

Stephen R. Snyder

SNYDER MORGAN LLP

200 West Main Street

Syracuse, Indiana 46567

srs@snydermorgan.com

rlm@snydermorgan.com

and

James J. O'Connor, Jr.

BARRETT & MCNAGNY LLP

215 East Berry Street

P.O. Box 2263

Fort Wayne, IN 46802

jjo@barrettlaw.com

By: /s/ Owen B. Dunn, Jr.
Owen B. Dunn, Jr.